

Environmental Services

Certified Mail P385 843 017
Return Receipt Requested

October 30, 1996

Mr. Todd Biewen, Supervisor
Compliance Determination Unit
Air Quality Division
Minnesota Pollution Control Agency
520 Lafayette Road
St. Paul, MN 55155

Subject: Metropolitan Wastewater Treatment Plant
Air Emission Facility Operating Permit 879-90-OT-3
Notice of Noncompliance of September 26, 1996
Report of Total Particulate Testing - Re-Test No. 1 for Incinerator No. 7

Dear Mr. Biewen:

Enclosed is the report of total particulate testing conducted by MMT Environmental Services Inc. on Incinerator No. 7 at the Metropolitan Wastewater Treatment Plant on September 18, 1996. This is the re-test of the June 18, 1996 test which the Agency determined to be in noncompliance with the total particulate emission standards.

Metropolitan Council Environmental Services (MCES) has chosen Option A for resolution of the noncompliance as indicated in the September 26 Notice of Noncompliance. The report fulfills the following requirements of Option A.

i. "Conduct a retest for each of the pollutants....on or before thirty (30) days after receipt of this letter."

The test was conducted before the date of the Notice of Noncompliance.

ii. "Provide written advance notice of testing, submit a test plan, and schedule a pretest meeting at least twenty-one (21) days prior to the retest date. The pretest meeting shall be held at least seven (7) working days prior to the date of the retest."

The test plan was submitted on September 13, 1996 and a pre-test meeting was held on September 16, 1996. MCES staff much appreciate Craig Averman's flexibility in scheduling the retest. The approval letter is dated September 18, 1996.

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iii. "Submit the final performance test results...within forty-five (45) days of conducting the retest. The cover letter shall indicate that the results are for a retest and that the retest was conducted due to a determination of noncompliance."

This report is submitted 42 days after the test. The letter and the report indicate the purpose of the test.

iv. "Include with the final test results a description of corrective action taken by the Company to achieve compliance."

A description of corrective action taken by Metro Plant operating personnel is included in the form of a memo on pages 56 and 57. It describes the activities on the checklist for the regular bi-monthly preventive maintenance shutdown.

v. "Submit a microfiche version of the final test report...within one hundred and five (105) days of conducted the retest."

The microfiche has been requested, and will be submitted as soon as it is available.

Should you have any questions, please contact Melba Hensel of my staff at 229-2072.

Sincerely,

A handwritten signature in cursive script, appearing to read "Keith J. Buttleman".

Keith J. Buttleman, Director
Environmental Planning and Evaluation Department

KJB:MMH:mh

Enclosure

cc (letter only): J. Brown (Metro process)
M. Mereness
L. Wolfert
cc (with report): Joanne Hart

FILE: Metro Air Reports
a:\metstack.rpt